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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

JOAN AMBROSIO, JANE LACAP, KEITH SWICK, BILL CHAN, COSMIN BANU, SHAHID RAHMATULLAH, DANA ROGERS, TONY TRINH, CHRISTIAN HALLORAN, NOVELETT WITT, ART BAIMKIN, ANGELITO MUYOT JR., JASON RUIZ, KESHAV KAMATH, PEET SAPSIN, and ALICIA ERBY

Plaintiffs.

V.

COGENT COMMUNICATIONS, INC.

Defendant.

CLASS AND COLLECTIVE ACTION

Case No 3:14-cv-02182-RS

**STIPULATION TO CONTINUE
MOTION FOR CLASS
CERTIFICATION AND
COLLECTIVE ACTION BRIEFING
AND HEARING SCHEDULE;
~~PROPOSED~~ ORDER**

STIPULATION

Plaintiffs Joan Ambrosio et al. (“Plaintiffs”) and Defendant Cogent Communications, Inc. (“Defendant”)(collectively, the “Parties”), through their counsel, hereby stipulate and agree that:

WHEREAS on May 28, 2015 this Court issued an order setting forth a new class certification and hearing schedule (Dkt. 39) as follows:

7 July 24, 2015 Plaintiffs' Motion for Class/Collective Certification
8 August 14, 2015 Defendant's Opposition
9 September 4, 2015 Plaintiffs' Reply
10 September 24, 2015, 1:30 pm Hearing/Case Management Conference

WHEREAS the parties just discovered that the stipulation leading to that order contained an erroneous schedule that did not reflect the agreement of the parties:

NOW, THEREFORE, the Parties, through their respective counsel, hereby stipulate, subject to the approval of the Court, to the following (slightly modified) schedule:

15 July 24, 2015 Plaintiffs' Motion for Class/Collective Certification
16 August 28, 2015 Defendant's Opposition
17 September 25, 2015 Plaintiffs' Reply
18 October 15, 2015, 1:30 pm Hearing/Case Management Conference

Dated: June 12, 2015 DUCKWORTH PETERS LEBOWITZ OLIVIER LLP

By: /s/ *Monique Olivier*

Monique Olivier

Attorneys for Plaintiffs

Dated: June 12, 2015 HAYNES & BOONE, LLP

By: /s/ *Tamara I. Devitt**

Tamara I. Devitt

Attorneys for Defendant

*I, Monique Olivier, attest that Tamara Devitt has concurred in the filing of this document.
(L.R. 5-1(j).)

~~PROPOSED~~] ORDER

PURSUANT TO STIPULATION, the following revised schedule for Plaintiffs' Class and Collective Certification Motion is:

July 24, 2015	Plaintiffs' Motion for Class/Collective Certification
August 28, 2015	Defendant's Opposition
September 25, 2015	Plaintiffs' Reply
October 15, 2015, 1:30 pm	Hearing/Case Management Conference

IT IS SO ORDERED.

Dated: 6/12/15



Richard Seeborg, Judge
United States District Court